

EXHIBIT 10

From: [J Edward Bell](#)
To: [Mirsky, Sara J. \(CIV\)](#); [Turner, Joseph B. \(CIV\)](#); [Zina Bash](#); [Dawn Bell](#); [Kevin Dean](#); [Matthew D. Quinn](#)
Subject: Camp Lejeune-ATSDR files
Date: Thursday, February 1, 2024 2:03:35 PM
Attachments: [image001.png](#)
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Good Afternoon Sara,

I appreciate your email of January 30, 2024, concerning the PLG's request for the ATSDR's "water modeling" and "health effects" complete project files (the "project files"). Unfortunately, however, we believe that the government's position on this matter fails to satisfy the discovery rules and is generally insufficient. **We request that the government produce the projects files immediately.**

Further, we are presently considering whether this matter must now be addressed with the Court. That said, in the interest of continuing our discussion, we are providing the following response to your referenced email.

First, we are writing to propose the PLG's virtual bates-labeling proposal for the project files. The process would involve the following:

1. The ATSDR project files would be cloned.
2. The cloned ATSDR project files would be processed as any other ESI document collection. This would assign bates numbers, gather file metadata, and create a load file.
3. The end product of Step 2 would be that all of the names of the files from the ATSDR project files would be converted to bates-referenced file names.
4. The ESI process would also create what is known as a load file. A load file organizes a document collection and associated metadata so that the production can easily be exported and ingested into a separate e-discovery database.

- [illegible]

Second, you agreed to investigate whether the government can provide an example of the “data use agreements” discussed during our meet and confer of January 29, 2024. Please let us know when the government will provide such an example “data use agreement” so that we can evaluate the government’s concerns with respect to the “health effects” portion of the project files.

Third, we request that the government promptly provide a report (such as a Tree-size report) of the project files, detailing the name and size of all items contained in the project files. We asked for such a report in the PLG's email of January 29, 2024. This report can be generated quickly and would not divulge any confidential information. The report should be produced without delay.

We look forward to your prompt response. The present email does not respond to each issue raised in your email of January 30, 2024.

Sincerely,

Ed Bell



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